


their staff. The Notes and information disclosed in the Notes shall not be disclosed to Plaintiff Crystal Eschert or to the City, its officials, or its employees;

3. Before counsel for either party asks a question during a deposition that raises issues derived from the Notes, counsel should consult with one another and attempt to reach agreement on reasonable disclosure of information. Portions of depositions that refer to information derived from the Notes may be sealed, if necessary;
4. At the conclusion of all proceedings in this litigation, including any appeals, counsel shall destroy their copy of the Notes and submit a written verification that the Notes have in fact been destroyed.

IT IS SO ORDERED.

Signed: March 28, 2017



Frank D. Whitney
Chief United States District Judge

